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10
 11 **UNITED STATES DISTRICT COURT**
 12
 13 **DISTRICT OF NEVADA**

14 RAYSHAWN JENKINS, an
 15 individual, on behalf of himself
 16 and all others similarly situated,
 17 Plaintiff,
 18 v.
 19

20 AMAZON.COM SERVICES,
 21 LLC, a foreign limited liability
 22 company; and DOES 1-50,
 23 inclusive,
 24 Defendants.

Case No. 2:24-CV-01562

**STIPULATION TO EXTEND TIME FOR
 PLAINTIFF'S RESPONSE AND
 DEFENDANT'S REPLY TO
 DEFENDANT'S MOTION TO DISMISS
 AND/OR STAY THE CASE
 (SECOND REQUEST)**

25 Plaintiff Rayshawn Jenkins and Defendant Amazon.Com Services LLC
 26 (collectively “Parties”), by and through their undersigned counsel, hereby stipulate,
 27 agree, and request that the previous deadlines for Plaintiff to respond to Defendant’s
 Motion to Dismiss and/or Stay the Case (“Motion”) [ECF Nos. 30 & 31] and for
 Defendant to reply in support of its Motion be extended up to and including November
 12, 2024, for Plaintiff and up to and including November 25, 2024, for Defendant.

1 1. Plaintiff's responses ("Responses") to Defendant's Motion to Dismiss
2 And/or Stay the Case was originally due to be filed on November 1, 2024.
3 Defendant's original deadline to reply was November 8, 2024.

4 2. The Parties stipulated to an extension of these deadlines (first request) on
5 November 1, 2024, which the Court granted the same day. [ECF Nos. 24, 36.]
6 Pursuant to the stipulated extension, Plaintiff's Responses were due to be filed one
7 week later on November 8, 2024, and Defendant's deadline to reply was extended to
8 November 20, 2024.

9 3. During the evening of Friday, November 8, 2024, Plaintiff's counsel was
10 unable to finalize and file the Responses before the midnight deadline due to exigent
11 personal circumstances involving his ongoing and unpredictable medical caregiving
12 responsibilities. Plaintiff fully intended to meet this deadline, and Plaintiff's counsel
13 devoted most of his work time and energy on the Responses during the seven-day
14 extension period leading up to the deadline. Pursuant to Local Rule LR IA 6-1(a),
15 Plaintiff's counsel's failure to meet the deadline was the result of excusable neglect.

16 4. Plaintiff respectfully requests that the Court extend the current stipulated
17 deadline to November 12, 2024, which represents an extension of one business day
18 excluding the intervening weekend and federal holiday (Veteran's Day). Defendant
19 does not oppose this brief extension.

20 5. The Parties further agree to a brief extension for Defendant's reply from
21 twelve (12) days to thirteen (13) days following Plaintiff's Responses.

22 6. Neither of these brief extensions will unduly delay this action or
23 prejudice either party.

24 7. Whereby the Parties hereby stipulate to extend Plaintiff's deadline to file
25 his Responses up to and including November 12, 2024, and to extend Defendant's
26 deadline to file its reply up to and including November 25, 2024.

27 8. This request is made in good faith and not for the purpose of delay.



1 Dated this 11th day of November, 2024.

2 /s/ Jason Kuller

3 Jason Kuller, Esq.

4 Robert Montes, Jr., Esq.

5 Rachel Mariner, Esq.

6 RAFII & ASSOCIATES, P.C.

7 Attorneys for Plaintiff
8 RAYSHAWN JENKINS

1 /s/ *Bradley J. Hamburger (with
2 permission)*

3 Montgomery Y. Paek, Esq.

4 Amy L. Thompson, Esq.

5 LITTLER MENDELSON, P.C.

6 Bradley J. Hamburger, Esq.

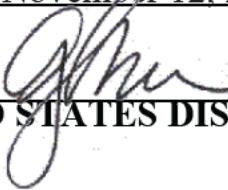
7 Megan Cooney, Esq.

8 GIBSON, DUNN & CRUTCHER LLP

9
10 Attorneys for Defendant
11 AMAZON.COM SERVICES LLC

12 IT IS SO ORDERED.

13 Dated: November 12, 2024

14 
15 UNITED STATES DISTRICT JUDGE

16
17 RAFII & ASSOCIATES, P.C.
18 EXCELLENCE | COMMITMENT | RESULTS

